REMARKS

Claims 1-3, 5-10, 12-17, 19-24, 26-28, and 36-43 are pending in the application. In the final Official Action dated July 6, 2007, the Examiner rejected claims 1-3, 5-10, 12-17, 19-24, 26-28, and 36-43 under 35 U.S.C. §103(a) as being unpatentable over *Brereton, et al. (U.S. 6,128,612)("Brereton")* in view of *LiVecchi (U.S. 6,427,161)* and further in view of *Jordan (U.S. 2002/0069157)*. Applicants respectfully traverse the rejection and address the Examiner's disposition below.

Independent claims 1, 8, 15, and 22 each claim subject matter relating to obtaining one or more of said client requests for hierarchically organized data at a server. The client requests are divided into one or more smaller units. Each of the smaller units are a transaction request serviceable by one of a plurality of worker threads, and include an envelope having a beginning tag and an ending tag that are recognizable by the respective worker threads. The smaller units are placed in a queue and serviced in order. The worker threads stop service of a respective smaller unit upon encountering an ending tag.

As described in Applicants' specification, Applicants' claimed subject matter relating to the inclusion of an ending tag allows a worker thread to know when to stop servicing the smaller unit. This is unlike conventional methods and systems, in which units so not include an envelope having an ending tag. In conventional methods and systems, a worker thread may stop servicing a unit before reaching the end of the unit, because the worker thread does not know where the end of the unit is and needs to start servicing another unit. (Specification, page 18, lines 4-19).

This is clearly unlike *Brereton* in view of *LiVecchi* and further in view of *Jordan*, which fails to disclose or suggest Applicants' claimed smaller units including an envelope and a worker object stopping service of a respective smaller unit upon encountering an ending tag. As acknowledged by the Examiner, *Brereton* in view of *LiVecchi* fails to teach this claimed subject matter. *Office Action of 7/6/2007*, page 4. Applicants respectfully submit that *Brereton* in view of *LiVecchi* and further in view of *Jordan* still fails to disclose or suggest this claimed subject matter.

Jordan describes at a high level that XML markup language tags in messages include beginning and ending tags. *Jordan* [0217]. However, there is no motivation provided in any of the cited references to combine *Jordan's* tags with *Brereton* and *LiVecchi*. Like the conventional art described in Applicants' Background of the Invention, *Brereton's* and *LiVecchi's* threads may

stop working on a unit at any time in order to work on another unit. This is because *Brereton's* and *LiVecchi's* threads are not instructed to process a unit until reaching the end of the unit. Although *Jordan* generally describes that units can have end tags, *Jordan*, *Brereton*, and *LiVecchi*, taken singly or in combination, provide no teaching or suggestion that *Jordan's* ending tags may be applied to client requests for hierarchically organized data that have been divided into smaller units that are serviceable by worker threads. This leap is simply not suggested by the cited references. Applicants respectfully submit the Examiner has used impermissible hindsight to allege that the cited references may be combined to arrive at the claimed invention.

Therefore, *Brereton* in view of *LiVecchi* and further in view of *Jordan* still fails to disclose or suggest claims 1, 8, 15, and 22.

Claims 2, 3, 5-7, 9, 10, 12-14, 16, 17, 19-21, 23, 24, 26-28, and 36-43 depend directly or indirectly from claims 1, 8, 15, or 22 and are therefore allowable for at least the same reasons that claims 1, 8, 15, and 22 are allowable.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

Conclusion

In view of the above remarks, Applicants submit that all claims are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

By: _____
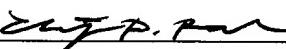
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